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13 *Attorneys for Plaintiff*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 SONALOLITA WILSON

17 CASE NO.: 2:18-CV-01241-JCM-NJK

18 Plaintiff

19 vs.

20 **STIPULATION AND ORDER REGARDING**  
21 **PLAINTIFF'S MOTIONS IN LIMINE**

22 UNITED STATES OF AMERICA ;  
23 LICETH DEMHA-SANTIAGO; JUAN  
24 DEMHA; DOES I THROUGH X; AND  
25 ROE CORPORATIONS 1 THROUGH X,

26 Defendants.

27 **ALL RELATED MATTERS**

28 IT IS HEREBY STIPULATED by Plaintiff, SONALOLITA WILSON, by and through  
her counsel of record, BRADLEY S. MAINOR, ESQ., JOSEPH J. WIRTH, ESQ., and ASH  
MARIE BLACKBURN, ESQ., of MAINOR WIRTH, LLP, Defendant, UNITED STATES OF  
AMERICA, by and through its counsel of record, R. THOMAS COLONNA, ESQ., and  
Defendants, LICETH DEMHA-SANTIAGO and JUAN DEMHA, by and through their counsel  
of record, STEVEN T. JAFFEE, ESQ. and JAN K. TOMASIK, ESQ. of HALL JAFFE &  
CLAYTON, LLP, that the following information be excluded and/or admitted at trial:

29 1. The parties agree that Plaintiff's treating physicians are permitted to testify as to

1 causation, diagnosis, prognosis, future treatment and extent of disability without a formal  
2 report. Plaintiff's treating physicians will be limited to testimony as to opinions formed  
3 during the course of treatment or testimony based upon review of medical records or  
4 reports during the course of treatment.

- 5 2. The parties agree that Plaintiff may admit a relevant Life Expectancy Table published by  
6 the U.S. Department of Health and Human Services at the time of trial for the purpose of  
7 evaluating only Plaintiff's claim for future pain and suffering and not Plaintiff's future  
8 medical expenses, which have been stricken.
- 9 3. The parties agree to exclude reference to or evidence of a 2013 motor vehicle collision,  
10 wherein Plaintiff did not sustain injury or seek medical treatment.
- 11 4. Defendants stipulate to the foundation and authenticity of Plaintiff's medical records and  
12 medical billing, subject to appropriate redactions.
- 13 5. Plaintiff stipulates to the foundation and authenticity of Plaintiff's prior medical records  
14 for the following dates of service: 11/9/2014; 11/12/2014; 2/4/2015; 2/22/2016.
- 15 6. Plaintiff will not call Robert Simmons as an expert, or otherwise, at trial.
- 16 7. The parties agree to exclude references to or evidence of any settlement offers,  
17 discussions, or negotiations between the parties.
- 18 8. The parties agree to exclude references to or evidence of insurance information on behalf  
19 of any party.

20 DATED this 10th day of March, 2023.

DATED this 10th day of March, 2023.

21 /s/ Ash Marie Blackburn  
22 BRADLEY S. MAINOR, ESQ.  
23 Nevada Bar No. 7434  
24 ASH MARIE BLACKBURN, ESQ.  
25 Nevada Bar No. 14712  
26 **MAINOR WIRTH, LLP**  
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28 Las Vegas, NV 89148  
*Counsel for Plaintiff*

21 /s/ R. Thomas Colonna  
22 PATRICK A. ROSE, ESQ.  
23 Assistant United States Attorney  
24 Nevada Bar No. 5109  
25 R. THOMAS COLONNA, ESQ.  
26 Assistant United States Attorney  
27 501 Las Vegas Blvd. So., Suite 1100  
28 Las Vegas, NV 89101  
*Counsel for Defendant United States of America*

1 *Re: Wilson v. United States of America*  
2 Stipulation and Order re. Plaintiff's Motions in Limine

3 DATED this 10<sup>th</sup> day of March 2023.

4 **HALL JAFFE & CLAYTON, LLP**

5 */s/ Jan Tomasik*

6 STEVEN JAFFE, ESQ.

7 Nevada Bar No. 7035

8 JAN K. TOMASIK, ESQ.

9 Nevada Bar No. 15104

9 7425 Peak Drive

9 Las Vegas, NV 89128-4438

10 *Counsel for Defendants Demha-Santiago and Juan Demha*

11 **ORDER**

12 IT IS SO ORDERED March 13, 2023.

13   
14 Jeanne C. Mahan  
15 UNITED STATES DISTRICT JUDGE

16 *Respectfully Submitted by:*

17 **MAINOR WIRTH, LLP**

18 */s/ Ash Marie Blackburn*

19 ASH MARIE BLACKBURN, ESQ.

20 Nevada Bar No. 14712

21 *Counsel for Plaintiff*